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August 31, 2020

VIA ECF FILING

Hon Paul A. Engelmayer
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square; Courtroom 1305
New York, NY 10007

RE: *Roc Nation, LLC v. HCC International Insurance Company, PLC*; Case No.: 1:19-cv-00554

Dear Judge Engelmayer:

This firm is legal counsel to Plaintiff Roc Nation, LLC ("Roc Nation"). We request permission, pursuant to Section 4(B) of Your Honor's Individual Rules and Practices, to file under seal the attachment to the Notice of Errata filed today. On July 23, 2020, the parties jointly requested permission to file under seal a number of documents cited in the Joint Statement of Undisputed Fact, including Document 16. *See* ECF No. 166. The Court granted the parties request. *See* ECF No. 168.

In review, Roc Nation discovered that the incorrect document was filed as Document 16, and requests permission to file the correct version of Document 16, attached to Roc Nation's Notice of Errata, under seal for the reasons stated in the parties' joint request on July 23, 2020.

Good cause exists for granting this request. The joint request was submitted under the terms and for the reasons set forth the Protective Order, and the parties understood that their confidentiality designations would apply when they were exchanging information and taking depositions in order to avoid objections preventing the disclosure of material that would be relevant in discovery and for settlement discussions, but which the parties would not agree to make publically available. The parties intended to file the correct version of Document 16 under seal, and the Court granted the parties joint request.

Thank you for your time and attention to this matter.

Very truly yours,

/s/ Amber Finch

Amber S. Finch

Granted.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

September 1, 2020